US ERA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

DEC 1 1987

Ralph Swanson
Assistant Regional Director
Federal Assistance
U.S. Fish and Wildlife Service
Lloyd 500 Building, Suite 1692
Portland, Oregon 97232

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

Dear Mr. Swanson:

A hazard assessment for ethoprop has been completed by the Ecological Effects Branch (EEB). EEB has determined that the use of this pesticide at current application rates exceeds the level of concern for endangered insects, birds and mammals.

With your Agency, EPA developed a Memorandum of Understanding (MOU) dated September 12, 1987. This MOU allows the Agency, with Fish and Wildlife Service concurrence, to adopt reasonable and prudent alternatives provided in previously issued biological opinions for products of similar toxicities and use patterns to avoid jeopardy to endangered species.

In this case EEB would refer to the carbofuran opinion of May 1, 1987 to determine the labeling requirements for ethoprop when used on peanuts. The carbofuran opinion indicated jeopardy to the Attwater's greater prairie chicken and recommended that the use of carbofuran be prohibited in the following Texas counties: Refugio, Austin, Colorado, Galveston, Brazoria, Goliad, Victoria, Aransas, and Harris.

EEB has enclosed the hazard assessment for ethoprop (trade name: Mocap) and two copies of the form: Summary of Adoption of Reasonable and Prudent Alternatives. Please sign and return one set to us with comments, as appropriate. If we can be of further assistance, please feel free to contact Dennis MCLane FTS 557-1993. We look forward to hearing from you in the near future.

Johnny T. Crower

Henry T. Craven Acting Chief Ecological Effects Branch Hazard Evaluation Division (TS-769-C)

Summary of EPA Adoption of Reasonable and Prudent Alternatives

resticide Ethoprop	Action Nematicide
name(s)	Insecticide
Registration No.	Registration Standard?YES
Use patterns Peanuts	
May affect situation determined	because of toxicity to:
() Aquatic	
() Fish () Invertebrate
(X) Terrestrial	
(X) Avian (X) Ma	mmal (X) Insect
() Plant	
Rationale: Ethoprop exceeds the le	evels of concern for mammals, birds
and insects. The carbo	furan biological opinion of May 1,
1987 indicated the gras	ssland habitat supporting Attwater's
prairie chickens is fre	equently juxtaposed to sorghum and
peanuts croplands throu	ghout its' range. Based on these
items EEB has requested	d adoption of reasonable and
prudent alternatives re	ecommended for carbofuran be
applied to ethoprop pro	oducts with use on peanuts.

Biologic	al opinior	n(s <u>)</u> referen	ced: Carbof	uran	, date	ed_5-1-81
Listed s	pecies in	jeopardy:	Attwater's	greater	prairie	chicken
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Comments:						
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